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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**  
12

13 PROBUILDERS SPECIALTY  
14 INSURANCE COMPANY, RRG, a District  
15 of Columbia Company,

16 Plaintiff,

17 vs.

18 HUNTER INSURANCE SERVICES, INC.,  
19 a California Corporation; and DOES 1  
20 through 10, inclusive,

21 Defendants.  
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CASE NO. 2:11-CV-01466

**JOINT DISCOVERY PLAN AND  
SCHEDULING ORDER SUBMITTED IN  
COMPLIANCE WITH FRCP 26(f) AND  
LR 26-1(e)**

Complaint Filed: September 12, 2011  
Discovery Cut-Off: None  
Motion Cut-Off: None  
Trial Date: None

29 Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure ("FRCP") and Local  
30 Rule 26-1, Plaintiff PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG ("Plaintiff"  
31 or "PROBUILDERS") and Defendant, HUNTER INSURANCE SERVICES ("Defendant" or  
32 "HUNTER"), by and through their respective counsel of record, hereby submit this joint Rule  
33 26(f) Report ("Discovery Plan").

34 I.

35 **INITIAL DISCLOSURES [Rule 26(f)(3)(A)]**

36 The parties agree that no changes should be made to the timing, form, or requirement  
37 for disclosures under FRCP 26(a). Plaintiff and Defendant agree to exchange initial disclosures  
38

1 by December 16, 2011. The parties will exchange a list of potential witnesses, documents or  
2 categories of documents available for inspection and copying, and categories of damages, and  
3 Defendant will identify any insurance policy that may satisfy part of a judgment that may be  
4 entered in the action.

5 II.

6 **POTENTIAL WITNESSES [Fed. R. Civ. P. 26(a)(1)(A)]**

7 The parties submit this disclosure statement pursuant to Rule 26 of the Federal Rules  
8 of Civil Procedure. Pursuant to Fed. R. Civ. P. 26(e), the parties reserves their right to  
9 supplement the disclosures made herein as discovery and plaintiff's investigation progress.

- 10 1. PMK of Hunter Insurance Services, Inc.  
11 c/o Murchison & Cumming, LLP  
12 Michael J. Nuñez, Esq.  
6900 Westcliff Drive, Suite 605  
Las Vegas, Nevada 89145

13 Person Most Knowledgeable is expected to testify as to the facts and circumstances  
14 surrounding the alleged incident which is the subject of this lawsuit.

- 15 2. Angela White  
16 c/o Murchison & Cumming, LLP  
17 Michael J. Nunez, Esq.  
6900 Westcliff Drive, Suite 605  
Las Vegas, Nevada 89145

18 Ms. White is expected to testify as to the facts and circumstances surrounding the  
19 alleged incident which is the subject of this lawsuit.

- 20 3. Mark Hunter  
21 c/o Murchison & Cumming, LLP  
22 Michael J. Nunez, Esq.  
23 6900 Westcliff Drive, Suite 605  
Las Vegas, Nevada 89145

24 Mr. Hunter is expected to testify as to the facts and circumstances surrounding the  
25 alleged incident which is the subject of this lawsuit.

- 26 4. PMK of ProBuilders Specialty Insurance Services, RRG  
27 c/o Branson Brinkop Griffith & Strong  
28 Harry Griffith, Esq.  
643 Bair Island Rd, Suite 400  
Redwood City, CA 94063

1 PMK for ProBuilders Specialty Insurance Services, is expected to testify as to the  
2 facts and circumstances surrounding the alleged incident which is the subject of this lawsuit.

3 5. All witnesses disclosed by any other party.

4 Discovery is continuing and, therefore, the parties reserve the right to supplement  
5 this disclosure as additional facts are discovered.

6 **III.**

7 **DOCUMENTS [Fed. R. Civ. P. 26(a)(1)(B)]**

8 The parties will make available those non-privileged, relevant documents that are in their  
9 possession, custody or control.

10 **IV.**

11 **DISCOVERY PLAN [Rule 26(f)(3)(B)]**

12 Discovery is needed for all issues raised in plaintiff's complaint and defendant's answers.  
13 Because Defendant's Answer was filed on October 26, 2011, the discovery cut-off date is as  
14 follows:

15 A. Discovery Cut-Off LR 26-1(e)(1): April 24, 2012

16 **V.**

17 **DISCLOSURE OR DISCOVERY OF ELECTRONICALLY-STORED INFORMATION [Rule**  
18 **26(f)(3)(C)]**

19 The parties are unaware of any issues regarding the disclosure or discovery of  
20 electronically-stored information at this point.

21 **VI.**

22 **CLAIMS OF PRIVILEGE OR PROTECTION [Rule 26(f)(3)(D)]**

23 The parties are unaware of any issues requiring a protective order at this time.

24 **VII.**

25 **APPLICABLE DEADLINES**

26 A. Amending pleadings and adding parties [LR 26-1(e)(2)]: January 24, 2012.

27 B. Expert disclosures [LR 26-1(e)(3)]  
28

1. Initial Expert Disclosures: February 23, 2012.
2. Rebuttal Expert Disclosures: March 26, 2012.
- C. Discovery Cut-Off [LR 26-1(e)(1)]: April 24, 2012.
- D. Dispositive Motions [LR 26-1(e)(4)]: May 23, 2012.
- E. Joint Pre-Trial Order [LR 26-1(e)(5)]: June 22, 2012.

DATED: December 5, 2011

**MURCHISON & CUMMING. LLP**

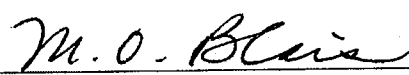
By

  
Michael J. Nuñez, Esq.  
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6900 Westcliff Drive, Suite 605  
Las Vegas, Nevada 89145  
Attorneys for Hunter Insurance Services, Inc.

DATED: December 5, 2011

**BRANSON BRINKOP GRIFFITH & STRONG  
LLP**

By

  
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643 Bair Island Road  
Two Embarcadero Center, Suite 1800  
Redwood City, CA 94063  
Attorneys for ProBuilders Specialty Insurance  
Services, RRG.

**IT IS SO ORDERED**

DATED: December 7th, 2011

  
United States Judge